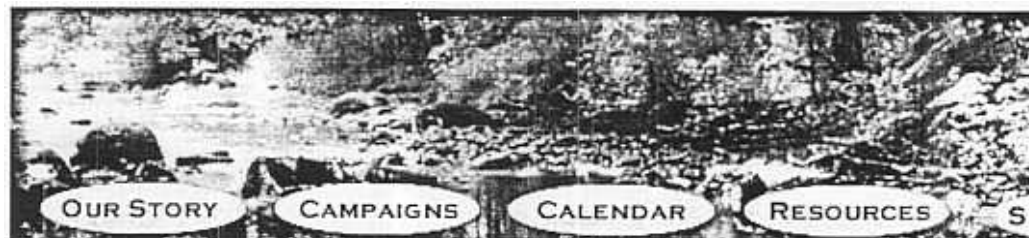




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Flaws in the Radiological Emergency Preparedness Plan

Flaws in the Radiological Emergency Preparedness Plan

MYTH: The emergency response plan is adequate to protect the public health and safety.

FACT: There is substantial evidence that the Radiological Emergency Preparedness (REPP) is inadequate to protect the public health and safety.

SUPPORTING EVIDENCE:

- The REPP for the 10-mile zone (which includes 367,000 people) cannot entirely account for human behavior. If there is an attack, panic will reign.
- The REPP explicitly excludes evacuation by residents outside the 10-mile zone, but the peak kill zone extends out to 17.5 miles and the peak injury zone extends out to 20 miles according to an NRC-commissioned report. We learned from the Chernobyl disaster that impacts extend tens to hundreds of miles beyond the 10-mile radius. In fact, more thyroid cancers in children at a thirty mile radius around Chernobyl than in children closer to the plant. The Emergency Evacuation Zone should be expanded to a 50-mile radius, which includes 20 million people.
- The logic behind a REPP for a 10-mile emergency planning zone is contradicted by academic research and the experience at Three Mile Island, which led to significant evacuation, or shadow evacuation, outside of the 10-mile zone.
- The REPP's ability to evacuate residents assumes a significant time lapse between activation of the plan and actual radiological release – at least five to eight hours. The plan estimates that it may take 5 to 15 hours just to evacuate from the 5-mile zone. [TK: these statements are not consistent, or are unclear]
- The REPP does not address the site-specific, hazardous conditions of a sabotage or a terrorist attack at the Indian Point facility.
 - The REPP does not anticipate any of the following: an intentional act of terrorism; a class one event involving Units 2 or 3; a radiological release from a fuel storage area; a spent fuel assembly fire; or the possibility of an explosion at the Indian Point facility.
 - The time that the REPP assumes will be available to evacuate may be drastically reduced in the event of a terrorist triggered emergency.
 - The REPP does not take into consideration the realistic and catastrophic effects of a terrorist attack on the Indian Point facility, nor does the plan have a comprehensive response to multiple attacks in the region, which may impair the efficient evacuation of the area.
 - The NRC should order the revision of Entergy's Emergency Response Plan in order to account and prepare for possible terrorist attacks. These reviews must contemplate not only realistic and catastrophic effects of a terrorist attack on the Indian Point facility, but a comprehensive response to multiple attacks in the region,

impair the efficient evacuation of the area. Examples of such attacks include or blockage of the Tappan Zee Bridge, loss of power to passenger railroads, events, which deny use of necessary infrastructure.

- The REPP does not take into consideration information from federal nuclear agency documents, which explains that a large amount of radiation can be released within as little as two hours of the start of some types of accidents.
- In the event of a sudden release, the REPP relies on a “sheltering” option. There is no evidence that a significant number of people will self-evacuate in spite of instructions to shelter. It is doubtful that those who choose to seek shelter in their homes would be adequately protected.
- The REPP calls for evacuating residents from within the 10-mile radius to reception points located within an 11- to 23-mile radius from the plant, even though those areas are well within the peak fatality and injury zones.
- The REPP seeks to avoid problems related to traffic congestion by relying on evacuating the area’s schoolchildren before parents and the general public learn of an accident. Without cell phones, pagers and 24-hour news broadcasts, it will not be possible to keep the public informed of an accident from the public for more than a few minutes, especially an accident triggered by a terrorist attack.
- The REPP explicitly relies on the willingness of parents to leave their children in school buses to evacuate separately, and reunite with their children at one or more designated evacuation points outside the zone many hours later. This is unrealistic, as many parents would consider this approach forfeiting parental responsibility. During the September 11 terrorist attack – a non-radiation emergency forty miles to the south – parents throughout Westchester County rushed to rescue their children from local schools. The notion that some parents won’t attempt to rescue their children flies in the face of academic research and common sense elsewhere.
- The REPP explicitly relies on the willingness of emergency workers, including school personnel and bus drivers, to travel into the zone (multiple trips in some cases) in percentages as high as 100%. This is unrealistic. Evidence suggests that there are an insufficient number of buses and few drivers who are properly trained and willing to participate in an actual evacuation.
- There are questions as to whether the area’s hospitals can adequately treat work-related injuries in the event of an emergency. Moreover, hospital personnel may themselves seek refuge from a descending radiation plume as medical personnel did during the Three Mile Island crisis.
- Not everyone can be evacuated. It is doubtful that those who had to be sheltered would be adequately protected.
 - The elderly and homebound who do not drive are expected to wait at home until they can walk to the nearest main thoroughfare with enough water and personal belongings to last three days.
 - The residents who rely on public transportation will be asked to wait in their homes until buses are available to transport them out of danger.
 - Individuals who are hospitalized or require sophisticated medical attention cannot be immediately evacuated.
 - Staff members in hospitals, elder care centers and assisted living facilities will be expected to “lock down” during such an emergency with little chance of participating in an organized evacuation.
 - FDR Veterans Hospital, Hudson Valley Hospital and Sing Sing prison are located within the emergency-planning zone. The REPP is not specific about who will remain at these sites to care for people who are unable to evacuate.
- Roads and bridges cannot handle the amount of traffic leaving the 10-mile radius beyond.
- The REPP focuses on the “event” occurring during school hours, but if it happens during the day, families are scattered with children in other activities and under various care, there is no provision for gathering them and transporting them to safety.
- In heavy snow or high winds, people will be told to remain in their homes, seal their windows, doors and fireplaces, turn off their heat or air conditioning and wait until they can go out. Those guidelines are unlikely to be followed in a catastrophic event.

- The manual assumes that everyone within the 10-mile zone has read the manual what to do, and is prepared to follow its instructions. It does not account for visitors people working in the places of business. The manual says "instructions are posted in places," yet there is no evidence that instructions are posted anywhere in the area.
- The plan says that men and women of child-bearing age are permitted to opt out of volunteering to assist with the evacuation. Unfortunately, this includes a high percentage of teachers, EMT's, police, emergency workers, bus drivers and nurses. Who then will guide traffic, drive emergency vehicles and assist people in need? The police chief has already stated they do not have enough personnel. Will the governor order the National Guard (most of whom are also of child-bearing age) to help maintain order and deal with secondary events that would occur during a panic-filled evacuation?
- Critics of the REPP describe the plan as unworkable, infeasible, inadequate, unimplementable, unrealistic and implausible. On paper, the REPP may appear to be a comprehensive plan. But from a practical standpoint, the plan is unrealistic. When there is no safe place to be, panic will prevail.
The CRAC-2 study, a 1982 report commissioned by the Nuclear Regulatory Commission, stated that "increasing the evacuation distance [from 10] to 25 miles could substantially reduce the peak consequences, but the feasibility of a timely evacuation from so close an area is highly questionable."